

UNITED STATES DISTRICT COURT
DISTRICT COURT OF NEW JERSEY

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GLOBAL SIGNAL ACQUISITIONS LLC and : Case No. 3:11-CV-00597-JAP-LHG
GLOBAL SIGNAL ACQUISITIONS IV LLC, :
Plaintiffs, :
- against - :
NASSAU BROADCASTING HOLDINGS INC., :
NASSAU TOWER HOLDINGS LLC, NASSAU :
TOWER REALTY LLC, and NASSAU :
BROADCASTING I, LLC :
Defendants. :
-----X

**FOURTH AMENDED
JOINT STIPULATION and
ORDER of SETTLEMENT**

ECF Case

WHEREAS, the above matter was terminated as a result of two (2) Joint Stipulations and Orders of Settlement (“JSOS”) filed on November 18, 2011 by and among the Plaintiffs and Nassau Broadcasting I, LLC (“NBI”) and Nassau Broadcasting Holdings, Inc. (“NBH”) in one JSOS and Nassau Tower Realty, LLC (“NTR”) and Nassau Tower Holdings, LLC (“NTH”) in the second JSOS; and

WHEREAS, both JSOS were explicitly conditioned upon the United States Bankruptcy Court for the District of Delaware approving the JSOS of NBI, the debtor in a chapter 11 proceeding then pending, which approval has been received by Order dated September 25, 2012.

WHEREAS, the effective date of the JSOS was expressly conditioned upon the completion of the amended documents provided for in each of the JSOS and filing of a stipulation of dismissal by June 1, 2012; and

WHEREAS, NBH, NTR and NTH filed a motion to vacate both JSOS¹, which motion was scheduled for an evidentiary hearing before the Court; and

WHEREAS, by Order dated November 7, 2011 and in advance of the scheduled evidentiary hearing, the Court administratively terminated the motion to allow the parties time to work out a settlement or, if settlement is not reached, to allow NBH, NTR and NTH to re-file the Motion and proceed with an evidentiary hearing; and

WHEREAS, without prejudice to the Motion of NBH, NTR and NTH, both the Plaintiffs and the Defendants with the approval of this Court as set forth in amended joint stipulations and orders of settlement executed by the Court on May 29, 2012, August 1, 2012 and September 27, 2012, previously extended the date by which all provisions of the first and second JSOS were to be completed to October 30, 2012; and

WHEREAS, the parties, which are in talks to resolve the issues raised by Defendants' Motion to Vacate the JSOS, wish to further extend the date of completion of all matters called for by the JSOS up to and including December 15, 2012; and

NOW, THEREFORE, IT IS HEREBY FURTHER STIPULATED AND AGREED:

- (a) That the October 30, 2012 date set forth in each of the two (2) JSOS is deleted and replaced with the date of December 15, 2012; and
- (b) This Fourth Amended Joint Stipulation and Order of Settlement is without prejudice to the Motion of NBH, NTR and NTH to vacate the first and second JSOS.

¹ Plaintiffs contend that NBH, NTR and NTH only moved to vacate the original JSOS.

[signatures on following page]

IN WITNESS WHEREOF, this Stipulation of Settlement is executed and sworn to as follows:

For Plaintiffs

/s/ David L. Snyder, Esq.

David L. Snyder, Esq. (5936)
Snyder & Snyder LLP
94 White Plains Road
Tarrytown, NY 10591
914.333.0700

Dated: November 9, 2012

**For Defendant,
Nassau Broadcasting I, LLC**

/s/ Timothy R. Smith, Esq.

Timothy R. Smith, Esq. (4798)
619 Alexander Road, Third Floor
Princeton, NJ 08540
609.987.8899

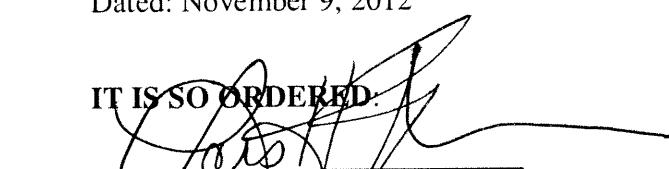
Dated: November 9, 2012

**For Defendants,
Nassau Broadcasting Holdings, Inc,
Nassau Tower Realty, LLC, and
Nassau Tower Holdings, LLC**

/s/ James D. Young

James D. Young, Esq.
Fox Rothschild, LLP
997 Lenox Drive, Building 3
Lawrenceville, NJ 08648-2311
609.896.3600

Dated: November 9, 2012


IT IS SO ORDERED.

HON. LOIS GOODMAN
United States Magistrate
United States District Court

District of New Jersey

Dated: November 9, 2012